

RACHEL B. ABRAMS (Cal Bar No. 209316)
ADAM B. WOLF (Cal Bar No. 215914)
Peiffer Wolf Carr Kane Conway & Wise, LLP
555 Montgomery Street, Suite 820
San Francisco, CA 94111
Telephone: 415.766.3544
Facsimile: 415.840.9435
Email: rabrams@peifferwolf.com
Email: awolf@peifferwolf.com

TIFFANY R. ELLIS (*Admitted PHV*)
Peiffer Wolf Carr Kane Conway & Wise, LLP
2229 Trumbull St.
Detroit, MI 48216
Telephone: 313.210.1559
Facsimile: 415.840.9435
Email: tellis@peifferwolf.com

Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084 CRB

**NOTICE OF MOTION AND MOTION TO
WITHDRAW AS COUNSEL FOR
PLAINTIFF JESSI WATT**

This Document Relates to:

Honorable Charles R. Breyer

Jessi Watt v. Uber Technologies, Inc., et al;
3:25-cv-04704-CRB

**NOTICE OF MOTION AND MOTION TO WITHDRAW AS COUNSEL FOR
PLAINTIFF J.W.**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD, PLEASE TAKE NOTICE
that as soon hereafter as the matter may be heard, Peiffer Wolf Carr Kane Conway and Wise,
LLP (“Peiffer Wolf”), counsel of record for Plaintiff Jessi Watt (“Plaintiff”), moves this Court
for an order permitting its withdrawal as counsel for Plaintiff.

This Motion is made pursuant to Local Rule 11-5(a) and C. This Notice of Motion &
Motion is based on the below Memorandum in Support and the accompanying Declaration of
Rachel B. Abrams (“Decl.”).

MEMORANDUM IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL

Pursuant to Local Civil Rule 11-5(a) and California Rules of Professional Conduct 1.16(b)(4) and 1.16(d), Peiffer Wolf submits this Memorandum of Law in support of its Motion to Withdraw as Counsel for Plaintiff J.W. Peiffer Wolf respectfully requests the Court grant the Motion.

STATEMENT OF FACTS

Peiffer Wolf should be permitted to withdraw as counsel for Plaintiff. An attorney may withdraw from a case by obtaining an order from the court after reasonable advance written notice has been provided to the client and to all other parties. Civ. L.R. 11-5(a); *see also* Cal. Rules Prof. Conduct 1.16(d)(1).

Peiffer Wolf gave appropriate advance notice of its intent to withdraw to Plaintiff beginning on September 16, 2025, with final notice on September 25, 2025. Decl. 5(k). Peiffer Wolf gave Uber notice of its intent to withdraw. Decl. 7. Peiffer Wolf has taken all possible steps to avoid prejudice to Plaintiff by explaining to her the possible consequences of failing to contact Peiffer Wolf or to meet discovery deadlines. Decl. 5-6. Despite those efforts, Plaintiff failed to establish communication with Peiffer Wolf. 5. Plaintiff has also failed to provide Peiffer Wolf with sufficient or adequate information to meet her obligations under PTO 10. 6. Peiffer Wolf has taken all reasonable steps to avoid foreseeable prejudice to Plaintiff. Decl. 9.

Under California Rule of Professional Conduct 1.16(b)(4), a lawyer may withdraw from a case if “the client ... renders it unreasonably difficult for the lawyer to carry out the representation effectively.” Here, Plaintiff rendered it unreasonably difficult for Peiffer Wolf to carry out the representation effectively by failing to communicate with Peiffer Wolf and failing to provide information required to prosecute her case, despite requests from Peiffer Wolf. Decl. 5. Therefore, Peiffer Wolf has been unable to meet Plaintiff’s discovery deadlines in this case.

Because this motion is not accompanied by a substitution of counsel or an agreement by Plaintiff to proceed *pro se*, Peiffer Wolf agrees to the condition imposed by Local Rule 11-5(b) to serve Plaintiff with all papers in this matter, unless or until Plaintiff appears *pro se*, other counsel appears on Plaintiff’s behalf, or upon further order of the Court. Decl. 10.

CONCLUSION

Peiffer Wolf respectfully requests that the Court enter an order terminating its representation of Plaintiff and allowing Plaintiff 30 days to retain new counsel.

DATED: December 5, 2025

RESPECTFULLY SUBMITTED,

BY: /S/ RACHEL B. ABRAMS

RACHEL B. ABRAMS (CAL BAR NO. 209316)

ADAM B. WOLF (CAL BAR NO. 215914)

**PEIFFER WOLF CARR KANE CONWAY &
WISE, LLP**

555 MONTGOMERY STREET, SUITE 820

SAN FRANCISCO, CA 94111

TELEPHONE: 415.766.3544

FACSIMILE: 415.840.9435

EMAIL: RABRAMS@PEIFFERWOLF.COM

AWOLF@PEIFFERWOLF.COM

TIFFANY R. ELLIS (*ADMITTED PHV*)

**PEIFFER WOLF CARR KANE CONWAY &
WISE, LLP**

2229 TRUMBULL ST.

DETROIT, MI 48216

TELEPHONE: 313.210.1559

FACSIMILE: 415.840.9435

EMAIL: TELLIS@PEIFFERWOLF.COM

COUNSEL FOR PLAINTIFF